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10 ATTORNEYS FOR PUTATIVE REPRESENTATIVE
 11 PLAINTIFF RADIO CITY, INC.

12 **UNITED STATES DISTRICT COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA**

14
15 IN RE TELESCOPES ANTITRUST
16 LITIGATION

Case No. 5:20-cv-03639-EJD

17 This Document Relates to:

Case No. 5:20-cv-03642-EJD

18 RADIO CITY, INC., and those similarly situated,

**STIPULATION REGARDING
AMENDED COMPLAINT**

19 Plaintiffs,

Location: Courtroom 4 – 5th Fl.
Judge: Hon. Edward J. Davila

20 v.

Compl. Filed: June 1, 2020
First Am. July 17, 2020
Compl. Filed:
Second Am. October 19, 2020
Compl. Filed:
Trial Date: None Set

21 CELESTRON ACQUISITION, LLC, SUZHOU
 SYNTA OPTICAL TECHNOLOGY CO., LTD.,
 SYNTA CANADA INT'L ENTERPRISES
 22 LTD., SW TECHNOLOGY CORP., OLIVON
 MANUFACTURING CO. LTD., OLIVON USA,
 23 LLC, NANTONG SCHMIDT OPTO-
 ELECTRICAL TECHNOLOGY CO. LTD.,
 24 PACIFIC TELESCOPE CORP., COREY LEE,
 DAVID SHEN, SYLVIA SHEN, JACK CHEN,
 25 JEAN SHEN, JOSEPH LUPICA, DAVE
 ANDERSON, LAURENCE HUEN, and DOES
 26 1-50,

27 Defendants.

1 Pursuant to Civil Local Rule 6-1(b) and 6-2, Plaintiff Radio City, Inc. and Defendants
2 Celestron Acquisition, LLC, Suzhou Synta Optical Technology Co., Ltd., Synta Canada Int'l
3 Enterprises Ltd., SW Technology Corp., Olivon Manufacturing Co. Ltd., Olivon USA, LLC,
4 Nantong Schmidt Opto-Electrical Technology Co. Ltd., Pacific Telescope Corp., Corey Lee, David
5 Shen, Sylvia Shen, Jack Chen, Jean Shen, Joseph Lupica, Dave Anderson, and Laurence Huen
6 ("Defendants"), by and through their respective counsel of record, hereby stipulate as follows:

7 WHEREAS, on June 2, 2021, the Court granted in part and denied in part Defendants'
8 Motions to Dismiss (ECF No. 173) (the "Court Order");

9 WHEREAS, the Court Order set a June 16, 2021, deadline for Plaintiff to file an amended
10 complaint;

11 WHEREAS, pursuant to Federal Rule of Civil Procedure 15(a)(3), Defendants would have
12 14 days thereafter to respond to the amended complaint;

13 WHEREAS, the Court entered a similar order granting in part and denying in part a motion
14 to dismiss in the coordinated indirect purchaser class action (the "IPP Action") bearing the case
15 number 5:20-cv-03639-EJD (IPP Action ECF No. 177);

16 WHEREAS, on June 7, 2021, Defendants and Indirect Purchaser Plaintiffs filed a
17 stipulation in the IPP Action (the "IPP Action Stipulation"), which sought to extend the deadlines
18 in the IPP Action to file an amended complaint and any responsive pleading thereto to July 27,
19 2021 and August 17, 2021, respectively (IPP Action ECF No. 180);

20 WHEREAS, on June 8, 2021, the Court approved the IPP Action Stipulation (IPP Action
21 ECF No. 181);

22 WHEREAS, Plaintiff has requested, and Defendants have agreed in the spirit of continued
23 coordination and professional courtesy to, a similar extension of the relevant deadlines to file an
24 amended complaint and any responsive pleading thereto;

25 WHEREAS, the parties have not previously sought any other modification of the deadlines
26 to file an amended complaint and any responsive pleading thereto;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED:

1. Plaintiff's deadline to file its amended complaint shall be extended to July 27, 2021.

2. Defendants' deadline to answer or otherwise respond to any amended complaint shall be extended to August 17, 2021.

3. By stipulating hereto, no Defendant waives any substantive or procedural claim, defense, position, or argument, including but not limited to the defense that they are not and should not be parties to this litigation.

Dated: June 9, 2021

Respectfully Submitted,

BRAUNHAGEY & BORDEN LLP

By: /s/Matthew Borden
Matthew Borden

Attorneys for Putative Representative Plaintiff
Radio City, Inc.

Dated: June 9, 2021

EISNER, LLP

By: /s/Christopher Frost
Christopher Frost

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Technology Co., Ltd., Synta Canada Int'l
Enterprises Ltd., SW Technology Corp.,
Olivon Manufacturing Co. Ltd., Olivon USA,
LLC, Nantong Schmidt Opto-Electrical
Technology Co. Ltd., Pacific Telescope Corp.,
Corey Lee, David Shen, Sylvia Shen, Jack
Chen, Jean Shen, Joseph Lupica, Dave
Anderson, and Laurence Huen

ATTESTATION OF FILER

In compliance with Civil Local Rule 5-1(i), the undersigned ECF user whose identification and credentials are being used to file this document hereby attests that all signatories have concurred and agreed to the filing of this document.

By: /s/Matthew Borden
Matthew Borden

[PROPOSED] ORDER

Pursuant to the Stipulation Regarding Amended Complaint, IT IS SO ORDERED.

Dated: _____, 2021

Hon. Edward J. Davila
United States District Judge